

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re WINSOME A. BUCKLEY** : **CHAPTER 13**  
: **Debtor(s)** : **BANKRUPTCY NO. 22-12561**

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Winsome A. Buckley, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by **Bank of America NA** on April 18, 2025. Debtors believe they can become current on all post-petition payments due under the August 31, 2023 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young  
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